

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
WATSON GRINDING AND, MANUFACTURING CO., INC.,	§	Case No. 20-30967 (MI)
	§	(Chapter 11)
	§	
WATSON VALVE SERVICES, INC.,	§	Case No. 20-30968 (MI)
	§	(Chapter 11)
Debtors,	§	
	§	
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MARIA ISABEL TREJO AND JAVIER LOPEZ HERRERA	§	
	§	
Plaintiffs,	§	
	§	
VS.	§	Adv. Pro. No. 20-3089
	§	
WATSON GRINDING AND MANUFACTURING CO., INC., WATSON VALVE SERVICES, INC., KMHJ MANAGEMENT COMPANY, LLC, KMHJ, LTD., WESTERN INTERNATIONAL GAS & CYLINDERS, INC., AND MATHESON TRI-GAS, INC.,	§	
	§	
Defendants.	§	

**PLAINTIFFS' JURISDICTIONAL STATEMENT
UNDER FED. R. BANKR. P. 9027(e)(3) AND BLR 9027-3**

TO THE HONORABLE MARVIN ISGUR, U.S. BANKRUPTCY JUDGE:

COMES NOW, MARIA ISABEL TREJO AND JAVIER LOPEZ HERRERA (hereinafter collectively referred to as the “Plaintiffs”) and make this their Plaintiffs’ Statement Under Fed. R. Bankr. P. 9027(e)(3) and BLR 9027-3 and show as follows:

1. The Plaintiffs do not consent to entry of final orders or judgment by the Bankruptcy Court in this matter. The Plaintiffs dispute the allegation that this adversary proceeding is a core

matter under 28 U.S.C. §157(b)(2). This adversary proceeding is not a core matter. This case is a case involving personal injury. It is specifically excluded from the Bankruptcy Court's core jurisdiction under 28 U.S.C. §157(b)(5).

2. The Plaintiffs have a right to a trial by jury and believe there is mandatory abstention as well. The Bankruptcy Court cannot conduct a jury trial, Plaintiffs do not consent to a jury trial before the Bankruptcy Court, and the Plaintiffs believe the case must be remanded to state district court.

3. The Plaintiffs reserve: (a) the right to seek remand and/or abstention; (b) to the extent that the case is not remanded to state district court, the right to have final orders in non-core matters entered by the United States District Court; (c) the right to trial by jury in any proceeding so eligible in this case or in any case, controversy, or proceeding related to this case; (d) the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (e) the right to contest jurisdiction or appropriate venue in this proceeding or any related proceeding; and (f) any other rights, claims, actions, defenses, that may be available under applicable law, all of which are expressly reserved.

Respectfully submitted,

WAUSON | PROBUS

By: /s/ Matthew B. Probus
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*ATTORNEYS FOR PLAINTIFFS,
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JAVIER LOPEZ HERRERA*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served electronically via the Court's ECF filing system on May 4, 2020.

/s/ Matthew B. Probus
Matthew B. Probus